

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FONTELLA BROWN MARSHALL,

Plaintiff,

-vs-

SHERIFF OF COOK COUNTY,

Defendant.

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No. 08 CV ____

(jury demand)

FILED: MAY 5, 2008

08CV2534 NF

JUDGE COAR

COMPLAINT MAGISTRATE JUDGE NOLAN

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under Title VII of the Civil Rights Act of 1964. The jurisdiction of this Court is conferred by 42 U.S.C. §2000e et seq.
2. Plaintiff Fontella Brown Marshall is an African-American female resident of the Northern District of Illinois.
3. Defendant is the Sheriff of Cook County.
4. Plaintiff has been employed by defendant from about 1998 to the present as a correctional officer.
5. From March 3, 2006 through December 5, 2007, plaintiff was assigned to work as an investigator in the Internal Affairs Division.
6. While assigned to the Internal Affairs Division, plaintiff was subjected to disparate treatment because of her race, including but not limited to being required to carry a heavier caseload than her white counterparts and being subjected to harsh discipline for the type of trivial oversights which were

overlooked for her white counterparts.

7. On December 5, 2007, because of her race and sex, plaintiff was subjected to an adverse employment action when she was transferred out of Internal Affairs.
8. Plaintiff filed a timely charge of discrimination with the EEOC and brings this action within 90 days of receipt of her notice of right to sue.
9. Plaintiff demands trial by jury.

Wherefore plaintiff requests that the Court order her reinstatement to the Internal Affairs Divison, that judgment be entered for compensatory and punitive damages in an amount in excess of one hundred thousand dollars and that the costs of this action, including reasonable attorney's fees, be taxed against defendant.

/s/ Kenneth N. Flaxman

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